

EXHIBIT 2

PROPOSED ORDER

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

ORDER GRANTING RELIEF FROM THE AUTOMATIC STAY

Upon the “Motion for Relief from Stay” (the “Motion”) filed by one hundred and nine (109) plaintiffs² that comprise *Rivera-Carrasquillo, et.al. v. Eduardo Bhatia-Gautier, et.al.*, Civil

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567- LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780- LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² The plaintiffs (“Movants”) in *Rivera-Carrasquillo, et.al. v. Eduardo Bhatia-Gautier, et.al.*, Civil No. 13-1296 (PG), and consolidated cases are: Elizaida Rivera-Carrasquillo; Sonja Marcano-Rios; Jonel Gonzalez-Compre; Gil Ortiz-Perez; Manuel Velez-Santiago; Kathia Soto-Cepeda; Hector Medina-Gonzalez; Jose D. Garcia-Quinones; Lucila Rivera-Santana; Rolando Arroyo-Melendez; Josefina Cardona-De-Jesus; Glaris Kuilan-Marrero; Jenny Velez-Cintrón; Glenda Ortega-Montañez; John Rangel-Falu; Jorge Melendez-Rivera; Noemi Muniz-Feliciano, as Estate Member of Elvin Joel Caban-Muñiz; Lixmarie Gonzalez-Hernandez; Marillie Gonzalez-Hernandez; Maria Camacho-Velez; Dirce Figueroa-Robles; Edwin Luciano-Echeandia; Francisco Pabon-Febus; Jose Perez-Otero; Rosa Robles-Lopez; William Rodriguez-Colon; Jorge Rodriguez-Morales; Cielo Roman-Ayala; William Rosales-Concepcion; Mariangela Rosario-Ortiz; Edward Santana-Leon; Idelia Torres-Cadiz; Jose Torres-Torres; Frances Abella-Padilla; Alexander Alvarez-Rivera; Ania Barreto-Reymundi; Blanca Cintron-Baez; Sydney Delgado-Garcia; Juan L. Fuentes-Marquez; Keysla Gonzalez-Dominguez; Julio M. Gonzalez-Garcia; Carmen Gonzalez-Rodriguez; Iris Hernandez-Ortiz; David Hernandez-Rodriguez; Margie Huertas-Gomez; Miguel D. Irizarry-Torres; Jose Maldonado-Torres; Mayna Y. Melendez-Berrios; Ivette Melendez-Quinones; Obdulio Morales-Colon; Nilsa Morales-Morales; Angel A. Morales-Vadi; Maria De Los A. Nater-Arvelo; Hector Perez-Alicea; Margarita Reyes-Ferrer; Nancy L. Rivas-Simmons; Nydia Rodriguez-Figueroa; Noel Rodriguez-Hernandez; Victor Roman-Rivera;

Case No. 13-1296 (PG), and consolidated cases,³ and eighty-two (82) plaintiffs⁴ that comprise *Torres-Torres, et.al. v. Perelló-Borrás, et.al.*, Civil Case No. 13-1560 (PG), and consolidated cases,⁵ (collectively, the “Movants”), to lift the automatic stay as to the defendants in such cases, namely, (1) Eduardo Bhatia-Gautier; (2) Denisse M. Rivera-González; (3) Tania Barbarrosa-Ortiz; (4) Luis Ramos-Rivera; (5) José Hernández-Arbelo; (6) Juan Vázquez-López, (7) Maritza

Miguel Sanchez-Flores; Olga L. Verdejo-Boria; Jose I. Jimenez; Carlos A. Torres-Pagan; Jose A. Rivera-Negron; Luis F. Ortiz-Parrilla; Edgardo Castellano-Rodriguez; Wilfredo Colon-Marti; Eric S. Rondon-Rodriguez; Jose G. Torres-Raices; Efrain Carrasquillo-Rios; Carmen Hernandez-Soto; Brenda Y. Otero-Molina; Jessica Santiago-Bermudez; Luis Benitez-De Los Santos; Jacqueline Pagan-Nieves; Carlos Pacheco-Irizarry; Yanairalee Navarro-Vazquez; Aureliz Cabrera; Obrien Reyes-Lopez; Emerilia Santiago-Chico; Victor L. Castro-Figueroa; Sheyla Gonzalez-Irizarry; Juan J. Matias-Matias; Antonio J. Taboada-Collazo; Maritza Ramos-Sepulveda; Yara M. Torres-Marin; Griselle Encarnacion-Garcia; Edward Burgos-Torres; Emilio O. Martinez-Alamo; Luis G. Saunders-Torres; Edwin J. Reyes-Marrero; Irma Rodriguez-Diaz; Victor Rodriguez-Torres; Carlos F. Miro-Fuertes; Maria Mejias-De-La-Torre; Nancy Monserrate-Encarnacion; Nahir Arrocho-Schmidt; Ricardo Casellas-Morales; Miguel A. Colon-Martinez; Carlos X. Cotto-Roman; Fernando Cuevas-Lugo; Yamilka Garcia-Matos; Emmy Hernandez-Rivera; Gretchen Medina-Fuentes; Adrian Melendez-Zeno; Lourdes Del P. Morales-Morales; Marie C. Peralta-Ramirez; Jennifer A. Quiñones-Velez; and Evelyn Vazquez-Perez.

³ These are: *García-Matos, et.al. v. Bhatia-Gautier, et.al.*, Civil No. 13-1384 (PG), *Rodríguez-Colón, et.al. v. Bhatia-Gautier, et.al.*, Civil No. 13-1812 (PG), *Náter-Arvelo, et.al. v. Bhatia-Gautier, et.al.*, Civil No. 13-1860 (PG), and *Jiménez, et.al. v. Bhatia-Gautier, et.al.*, Civil No. 13-1896 (PG)

⁴ The plaintiffs (“Movants”) in *Torres-Torres, et.al. v. Perelló-Borrás, et.al.*, Civil No. 13-1560 (PG), and consolidated cases are: Janice Torres-Torres, Eduardo Betancourt-Otero, Migdalia Silva-Acevedo, Marjorie Ocasio-Santiago, Jamilette Ramírez-Sánchez, Freddy Ramos-Soto, Naisha Cintrón-Santiago, José Rohena-Sosa, Kevin González-Álvarez, Ángel Maldonado-Alicea, José Oyola-Márquez, Carlos De Jesús-Arzola, Luis Rivera-Rivera, Gladys Alberti-Torres, Lizbet Robles-Rodríguez, Juan Santiago-González, Nangely De Jesús-Morales, Asnel Fernández-Martínez, Wai Lo Lok-Santiago, Carlos J. Malavé-Mayol, Luis Maldonado-Cotto, Nancy Morales-Rivera, Miguel A. Hernández-Montanez, Aura B. Rivera-Medina, José A. Rivera-Ocasio, Wilfredo Soto-Arce, Vilmarie Texidor-Sánchez, Juana E. Sepúlveda-Valentín, Luz Maldonado-Martínez, José Arroyo-Ortiz, Iván Torres-Sánchez, and Carlos Cruz-Díaz, Karla Medina-Vilariño, Julio Feliz-Pons, Jorge López-Santiago, Haydee Resto-Colón, Victoria Ramírez-Concepción, Ninochka Márquez-Rosa, Nivea J. Ortiz-Cabrera, Alba N. Soto-Rojas, Sonia Chavez-Herrera, María De Los A. Rivera-Díaz, Pedro L. López-Reyes, Gricel Méndez-Santos, Sandra Toro-Martínez, Evelyn Rodríguez-Marrero, Angel Lafuente-Amaro, Solbee Malavé-Vargas, Jorge Pérez-Borroto, Margarita Arroyo-Molina, Nilsa Pagán-Serrano, Enid Ruiz-Rodríguez, Marielis Rodríguez-León, Gabriel Sánchez-Ríos, Jonathan De Santiago-Moreno, Carlos Fernández-Flores, Leadette González-Colón, Heriberto Figueroa-Santana, Florentín Tirado-Carlo, Christian Morales-León, Luz Pérez-Betancourt, Yesenia María Suárez, Isabel De La Cruz-Sánchez, Angel Acabá-Vázquez, Miguel Santiago-Calderón, Thelma Delgado-Pedrogo, Nydia Tosas-Cordero, Eleonor Rodríguez-Avilés, Edwin Torres-Cruz, Joel Seijo-Rivera, William Torrellas-Díaz, Roberto Valentín-Santiago, Yamaira Ortiz-Perea, Omayra Garay-García, Enid Pillot-Martínez, Laura Rivera-Rullán, Alex Rivera-Portela, Emmanuel Fontanilla-Espinal. Miguel González-Rolón, Omar Santiago-Rodríguez, Claimy Ramírez-Díaz; and Emitza Cotto - Escalera

⁵ These are: *Medina-Vilariño, et.al. v. Perelló-Borrás, et.al.*, Civil No. 13-1820 (PG); *Robles-Rodríguez, et.al. v. Perelló-Borrás, et.al.*, Civil No. 13-1862 (PG); *Malavé-Vargas, et.al. v. Perelló-Borrás, et.al.*, Civil No. 13-1895 (PG); and *Maldonado-Martínez, et.al. v. Perelló-Borrás, et.al.*, Civil No. 15-2738 (PG)

Alejandro-Chevres. (8) Jaime Perelló-Borrás; (9) Javier Vázquez-Collazo, (10) Rosendo Vela-Birriel, (11) Álvaro Vázquez-Ramos; and (12) Miguel Arana-Colón (collectively, the “non-debtors”) and the Court having found it has subject matter jurisdiction over this matter under section 306(a) of PROMESA; and it appearing that venue is proper under section 307(a) of PROMESA; and the Court having found that relief from stay requested by Movants is in the best interest of the Commonwealth of Puerto Rico, and its creditors, and other parties in interest; and the Court having found that Movants properly noticed the Motion and no further notice is required; and the Court having reviewed the Motion, and determined that the legal and factual arguments set forth therein establish cause for relief from the automatic stay; and that objections to the relief from stay have been overruled; upon deliberation and finding cause to lift the stay as set forth below, IT IS HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. Pursuant to Bankruptcy Code sections 362(d)(1), 922 and 105(a), made applicable to the Title III cases by PROMESA section 301(a), the Title III Stay is hereby lifted solely as to the non-debtors. The automatic stay shall remain in place in all other respects.
3. This Order grants and allow Movants to fully execute and enforce the non-debtors’ settlement liability arising from the settlement agreements executed between the non-debtors and Movants.
4. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, enforcement, or interpretation of this Order.
5. The district court which presided over the above-mentioned settlement agreements retains jurisdiction over all matters pertaining to them, including their enforcement.

6. Notwithstanding any applicability of any Federal Rule of Bankruptcy Procedure, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

7. This Order resolved Docket Entry No. _____ in Case No. 3283.

SO ORDERED.

Laura Taylor Swain
United States District Judge

Dated: _____, 2018